

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Mahmoud Dakowa,

Plaintiff,

v.

MSW Capital, LLC, and  
Messerli & Kramer, P.A.,

Defendants.

Civil File No. 16-cv-2753  
(ADM/DTS)

**DECLARATION OF DARREN  
BAYER SCHWIEBERT**

Darren Brayer Schwiebert states as follows:

1. I represent Plaintiff Mahmoud Dakowa in this case.
2. Attached as Exhibit A hereto is a copy of MSW Capital's answers to Plaintiff's Interrogatories.
3. Attached as Exhibit B hereto is a copy of my May 12, 2017 email to MSW Capital's counsel seeking a meet and confer on MSW Capital's discovery responses.
4. Attached as Exhibit C hereto is a copy of MSW Capital's counsel's May 15, 2015 email response to me, requesting formal "objections" to the MSW Capital's discovery responses.
5. Attached as Exhibit D hereto is a copy of my May 31, 2017 letter to MSW Capital providing individual formal objections to MSW Capital's responses to Interrogatory Nos. 3-7.

6. Attached as Exhibit E hereto is a copy of state Court Orders produced by Plaintiff in which the type of Requests to Admit at issue in this case sought admissions as to things that were false.
7. Attached as Exhibit F hereto is a correct copy of an example of a letter from a consumer to Defendant Messerli & Kramer expressing confusion at the type of discovery requests at issue in this case.
8. Attached as Exhibit G hereto is a true and correct copy Defendant Messerli & Kramer's discovery responses.
9. Attached as Exhibit H is a true and correct copy of Defendants' counsel's June 1, 2017 email providing the previously undisclosed page of Messerli & Kramer's interrogatory responses.
10. Attached as Exhibit I is a true and correct copy of my email and letter dated June 23, 2017, providing detailed formal objections to Messerli & Kramer's interrogatory responses. I have not yet received a response to this letter.
11. Attached as Exhibit J is a true and correct copy of a sample of a redacted document produced by Messerli & Kramer.
12. I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 26, 2016

s/ *Daren Brayer Schwiebert*  
Darren Brayer Schwiebert